

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CITY OF ALMATY, KAZAKHSTAN and
BTA BANK JSC,

Plaintiffs / Counterclaim Defendants,

and

ARCANUM (ASIA) LIMITED and REPUBLIC OF
KAZAKHSTAN,

[Proposed] Counterclaim Defendants.

-against-

FELIX SATER, DANIEL RIDLOFF, BAYROCK
GROUP INC., GLOBAL HABITAT SOLUTIONS,
INC., RRMI-DR LLC, FERRARI HOLDINGS LLC,
and MEM ENERGY PARTNERS LLC,

Defendants / Counterclaim Plaintiff

19 Civ. 2645 (AJN) (KHP)

To: Counsel of Record
(Via ECF)

KIRBY MCINERNEY LLP
Andrew McNeela, Esq.
250 Park Avenue, Suite 820
New York, NY 10177
amcneela@kmlp.com
212.371.6600
Counsel for Arcanum
(Via Email)

**FELIX SATER'S CORRECTED NOTICE OF MOTION TO AMEND
HIS ANSWER, ASSERT SUPPLEMENTAL COUNTERCLAIMS,
AND JOIN ADDITIONAL COUNTERCLAIM DEFENDANTS**

PLEASE TAKE NOTICE that, upon the Declaration of John H. Snyder, Esq. dated February 3, 2021, and upon the [Proposed] Amended Counterclaims annexed thereto, and upon the Memorandum of Law dated February 18, 2021, Felix Sater will move this Court on March

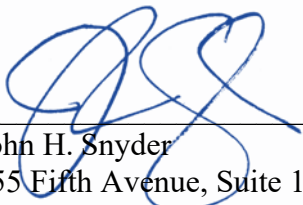
25, 2022 at 9:30 a.m., or on such other time and date as the Court may designate, for an Order (i) granting Sater leave to amend his Answer under Rule 15(a) and 16(b) of the Federal Rules of Civil Procedure; (ii) granting him leave to interpose supplemental counterclaims pursuant to Rule 13(e); (iii) designating Sater's counterclaims as compulsory under Rule 13(a); (iv) granting Sater leave to join Arcanum and Kazakhstan as counterclaim defendants under Rule 20(a)(2); (v) adjourning the discovery cutoff date by 120 days, to the end of June 2022, to enable the parties to complete discovery, which was paused due to good faith mediation efforts; and (vi) granting such other and further relief as the Court may deem appropriate.

PLEASE TAKE FURTHER NOTICE that, pursuant to Fed. R. Civ. P. 27(a)(3), opposition papers shall be due on March 4, 2022 and reply papers shall be due on March 18, 2022.

Dated: New York, New York
February 18, 2022

JOHN H. SNYDER PLLC

By:



John H. Snyder
555 Fifth Avenue, Suite 1700
New York, New York 10017
Tel: (917) 292-3081
Email: john@jhs.nyc